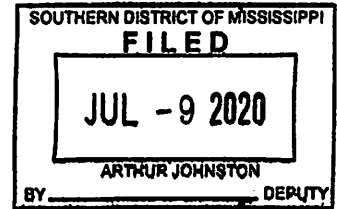


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:20CR64 HSO-RHW

MARIO KING and
NATASHA R. KING

18 U.S.C. § 371
18 U.S.C. § 1343

The Grand Jury charges:

COUNT 1

From sometime in or about December 2018 and continuing through at least May 2019, in Jackson County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **MARIO KING and NATASHA R. KING**, did knowingly and willfully conspire with each other and with others known and unknown to the Grand Jury, to commit offenses against the United States, to wit, wire fraud in violation of Title 18 U.S.C. §1343, and to do so devised and intended to devise a scheme and artifice to defraud contributors to the Mayor's Gala, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, transmitted or caused to be transmitted in interstate and foreign commerce certain wire communications for the purpose of executing the scheme or artifice as follows:

During the times listed above, the defendants, **MARIO KING and NATASHA R. KING**, devised and intended to devise a scheme to defraud contributors to the Mayor's Gala ("Gala"), and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

The defendant, **MARIO KING**, is, and at all times relevant to this indictment was, the Mayor of the city of Moss Point, Mississippi. The defendant, **NATASHA R. KING**, is the wife of Mayor Mario King.

The defendants, **MARIO KING and NATASHA R. KING**, began soliciting funds for a

Gala to be held on March 23, 2019 in Moss Point, Mississippi. The written solicitation stated that the “gala honors and supports organizations that are making a difference for the mental health community. Proceeds support the efforts of mental health in the City of Moss Point with a focus on the Moss Point School District, converting spaces into a therapeutic and innovative learning environment.”

On March 4, 2019, the defendants, **MARIO KING** and **NATASHA R. KING**, appeared together on WLOX television and described the event and that funds from the Gala were to be used to create safe spaces for mental health counselling in the Moss Point School District.

It was the understanding of those contributing to the Gala, either in the form of tickets purchased or contributions, that the proceeds from the Gala would go to the Moss Point School District.

In fact, while some of the funds were used to pay for the cost of the Gala, the proceeds did not go to the Moss Point School District. Instead, defendants **MARIO KING** and **NATASHA R. KING**, used the proceeds for personal purchases, including the down payment on the purchase of a vehicle, cash withdrawals and credit card debts to complete the purchase of a personal pet.

In furtherance of the conspiracy and to carry out its objectives, the following overt acts were committed:

1. On April 19, 2018 defendants, **MARIO KING** and **NATASHA R. KING**, and others known and unknown, formed Rejuvenate LLC by filing a Certificate of Formation with the Secretary of State of Mississippi.
2. On April 30, 2018 defendant, **NATASHA R. KING**, opened a bank account for Rejuvenate LLC with Hancock Bank in Gulfport, Mississippi.
3. Sometime in late 2018 defendants, **MARIO KING** and **NATASHA R. KING**, began soliciting contributions and selling tickets to the Gala to be held in March,

2019 in Moss Point, Mississippi. The Gala was designed to, and was represented to, be a benefit to support the Moss Point School District.

4. On March 4, 2019, defendants, **MARIO KING and NATASHA R. KING**, appeared on WLOX to promote the fundraiser and explained that the Gala was to benefit the Moss Point School District.
5. The defendants, **MARIO KING and NATASHA R. KING**, received these contributions by way of checks, PayPal and in-kind contributions.
6. The defendants, **MARIO KING and NATASHA R. KING**, caused these contributions to be deposited or transferred into the Rejuvenate LLC bank account at Hancock Whitney Bank (previously Hancock Bank).
7. Some of the funds deposited were used for the purpose of hosting the Gala. Most of the funds, however, were not. The defendants, **MARIO KING and NATASHA R. KING**, failed to provide any of these funds to the Moss Point School District as represented in their solicitations.
8. On April 8, 2019 defendant, **NATASHA R. KING**, used a debit card on the Rejuvenate LLC bank account and the funds solicited for the Gala to make a \$2000 down payment on a Cadillac XTC with CarMax.
9. On April 20, 2019, defendant, **NATASHA R. KING**, returned the Cadillac XTC. On April 26, 2019 she received a check from CarMax for the \$2000 down payment made on April 8, 2019.
10. On April 29, 2019, she deposited that check into the personal checking account of defendants, **MARIO KING and NATASHA R. KING**.
11. On May 1, 2019, defendant, **NATASHA R. KING**, withdrew \$1000 cash from the Rejuvenate LLC account and which was proceeds from the Gala.
12. On that same day, she withdrew \$2700 cash from the personal checking account of

defendants, **MARIO KING and NATASHA R. KING**, \$2000 of which originated in the Rejuvenate LLC account and which was proceeds from the Gala.

13. On May 12, 2019, defendant, **NATASHA R. KING**, purchased a Volvo automobile by paying a down payment of \$3700, \$3000 of which was originally from the Rejuvenate LLC account and was proceeds from the Gala.

14. On April 16, 2019 defendants, **MARIO KING and NATASHA R. KING**, paid off two credit card accounts with Synchrony Bank, one for \$270 and the other for \$475, from the Rejuvenate LLC bank account and the funds solicited for the Gala. Both of those credit cards, and the balance on them, had been used solely for the purchase of a Biewer Terrier from the Animal Medical Center in Hattiesburg, Mississippi in December 2018.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2-14

THE SCHEME

From sometime in late 2018 or early 2019 until on or about May 2019, the defendants, **MARIO KING and NATASHA R. KING**, devised and intended to devise a scheme and artifice to defraud contributors to the Mayor's Gala, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, transmitted or caused to be transmitted in interstate and foreign commerce certain wire communications for the purpose of executing the scheme or artifice.

It was part of the scheme that:

The defendants, **MARIO KING and NATASHA R. KING**, formed Rejuvenate LLC as a limited liability company with the Mississippi Secretary of State. Rejuvenate LLC, is a Limited Liability Company that was formed in April 2018. **NATASHA R. KING**, was the registered agent and President of Rejuvenate LLC and **MARIO KING** was listed as a member. During that

same month, Rejuvenate LLC opened a bank account at Hancock Bank. The account was opened by **NATASHA R. KING** who had signatory power over the account. With the exception of a monthly paper statement fee, the account remained dormant until December 2018.

Beginning in late 2018 or early 2019, defendants, **MARIO KING** and **NATASHA R. KING**, began soliciting funds for the Gala to be held on March 23, 2019 in Moss Point, Mississippi. The written solicitation stated that the “gala honors and supports organizations that are making a difference for the mental health community. Proceeds support the efforts of mental health in the City of Moss Point with a focus on the Moss Point School District, converting spaces into a therapeutic and innovative learning environment.”

It was the understanding of those contributing to the Gala, either in the form of tickets purchased or contributions, that the proceeds from the Gala would go to the Moss Point School District.

In fact, while some of the funds were used to pay for the cost of the Gala, the proceeds did not go to the Moss Point School District. Instead, defendants, **MARIO KING** and **NATASHA R. KING**, used the proceeds for personal purchases, including the down payment on the purchase of a vehicle, cash withdrawals and credit card debts to complete the purchase of a personal pet.

On or about each of the dates set forth below, in Jackson County, in the Southern District of Mississippi, and elsewhere, defendants, **MARIO KING** and **NATASHA R. KING**, aided and abetted by each other and by others known and unknown to the Grand Jury, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

Count	Date	Description	
2	2/25/19	Deposit of \$1070 from B.N. to PayPal account #	2759

Count	Date	Description
3	3/1/19	Transfer of \$250 from PayPal account # 2759 to Rejuvenate LLC account number ****0965
4	3/11/19	Transfer of \$1525.44 from PayPal account # 2759 to Rejuvenate LLC account number ****0965
5	3/13/19	Transfer of \$104.80 from PayPal account # 2759 to Rejuvenate LLC account number ****0965
6	3/19/19	Cash withdrawal on debit card for Rejuvenate LLC account number ****0965 of \$500
7	3/21/19	Deposit of \$500 from Bob Boyte Honda to PayPal account # 2759
8	3/22/19	Transfer of \$1010.05 from PayPal account # 2759 to Rejuvenate LLC account number ****0965
9	3/24/19	Transfer of \$158.95 from PayPal account # 2759 to Rejuvenate LLC account number ****0965
10	4/5/19	Cash withdrawal on debit card for Rejuvenate LLC account number ****0965 of \$500
11	4/8/19	\$2000 down payment on debit card for Rejuvenate LLC account number ****0965 for purchase of Cadillac XTC to CarMax
12	4/16/19	\$270 electronic payment from Rejuvenate LLC account number ****0965 to Synchrony Bank to pay off outstanding credit card debt for prior purchase of a Biewer Terrier
13	4/16/19	\$475 electronic payment from Rejuvenate LLC account number ****0965 to Synchrony Bank to pay off outstanding credit card debt for prior purchase of a Biewer Terrier
14	4/22/19	Withdrawal on debit card for Rejuvenate LLC account number ****0965 of \$350

All in violation of Title 18, United States Code, Sections 1343 and 2.

Darren L. Hurst, Jr.
D. MICHAEL HURST, JR.
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this, the 10th day of June 2020.

A TRUE COPY, I HEREBY CERTIFY
ARTHUR JOHNSTON, CLERK
BY: *Arthur Johnston*

DEPUTY CLERK

Donald R. Anderson
UNITED STATES MAGISTRATE JUDGE